

Jeffrey N. Pomerantz, Esq.
Andrew W. Caine, Esq.
(admitted *pro hac vice*)
PACHULSKI STANG ZIEHL & JONES LLP
10100 Santa Monica Boulevard
Los Angeles, California 90067-4100
Telephone: (310) 277-6910
Telecopy: (310) 201-0760

Lynn L. Tavenner, Esq. (VA Bar No. 30083)
Paula S. Beran, Esq. (VA Bar No. 34679)
TAVENNER & BERAN, PLC
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219
Telephone: (804) 783-8300
Telecopy: (804) 783-0178

*Counsel for the Circuit City Stores, Inc.
Liquidating Trust*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., <u>et al.</u> ,	:	Case No. 08-35653-KRH
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	

**NOTICE OF LIQUIDATING TRUST'S FIRST OMNIBUS
OBJECTION TO LANDLORD CLAIMS
(REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS,
RECLASSIFICATION OF CERTAIN MISCLASSIFIED CLAIMS,
DISALLOWANCE OF CERTAIN INVALID CLAIMS,
DISALLOWANCE OF CERTAIN LATE FILED CLAIMS,
AND DISALLOWANCE OF CERTAIN AMENDED CLAIMS)**

PLEASE TAKE NOTICE that the Circuit City Stores, Inc. Liquidating Trust (the "Liquidating Trust" and/or "Trust"), through Alfred H. Siegel, the duly appointed trustee of the Trust (the "Trustee"), pursuant to the Second Amended Joint Plan of Liquidating of Circuit City Stores, Inc. and its Affiliated Debtors and Debtors in Possession and its Official Committee of Creditors Holding General Unsecured Claims in the above-captioned cases of the above referenced estates of Circuit City Stores, Inc. et al. (collectively, the "Debtors") filed the Liquidating Trust's First Omnibus Objection to Landlord Claims (Reduction of Certain Partially Invalid Claims, Reclassification of Certain Misclassified Claims, Disallowance of Certain Invalid Claims, Disallowance of Certain of Late Filed Claims, Disallowance of Certain Amended Claims and Disallowance of Certain Invalid Claims (the "Objection") with the United States Bankruptcy Court for the Eastern District of Virginia (the "Bankruptcy Court"). A copy of the Objection is attached to this notice (this "Notice") as Exhibit 1. By the Objection, the Liquidating Trust is seeking to reduce certain claims, reclassify certain claims, and disallow certain claims.

PLEASE TAKE FURTHER NOTICE THAT on April 1, 2009, the Bankruptcy Court entered the Order Establishing Omnibus Objection Procedures and Approving the Form and Manner of the Notice of Omnibus Objections (Docket No. 2881) (the “Order”), by which the Bankruptcy Court approved procedures for filing omnibus objections to proofs of claim and requests for allowance and payment of administrative expenses and/or cure claims (collectively, the “Claims”) in connection with the above-captioned chapter 11 cases (the “Omnibus Objection Procedures”).

Specifically, the Objection seeks to reduce, disallow, or reclassify certain claims, including your claim(s), listed below, all as set forth in the Objection.

TO:	<u>Claim Number</u>	<u>Claim Amount</u>	<u>Reference Objection</u>
-----	-------------------------	-------------------------	--------------------------------

SPECIFIC INFORMATION PROVIDED ON INDIVIDUALIZED NOTICE

YOU ARE RECEIVING THIS NOTICE BECAUSE THE PROOF(S) OF CLAIM LISTED HEREIN THAT YOU FILED AGAINST ONE OR MORE OF THE DEBTORS IN THE ABOVE-CAPTIONED CHAPTER 11 CASES ARE SUBJECT TO THE OBJECTION. YOUR RIGHTS MAY BE AFFECTED BY THE OBJECTION. THEREFORE, YOU SHOULD READ THIS NOTICE (INCLUDING THE OBJECTION AND OTHER ATTACHMENTS) CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.

MOREOVER, PURSUANT TO RULE 3007-1 OF THE LOCAL RULES OF THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA AND THE OMNIBUS OBJECTION PROCEDURES, UNLESS A WRITTEN RESPONSE AND A REQUEST FOR A HEARING ARE FILED WITH THE CLERK OF THE COURT AND SERVED ON THE OBJECTING PARTY BY 4:00 P.M. (EASTERN TIME) ON APRIL 7, 2011, THE COURT MAY DEEM ANY OPPOSITION WAIVED, TREAT THE OBJECTION AS CONCEDED AND ENTER AN ORDER GRANTING THE RELIEF REQUESTED WITHOUT A HEARING.

Critical Information for Claimants
Choosing to File a Response to the Objection

Who Needs to File a Response: If you oppose the relief requested in the Objection and if you are unable to resolve the Objection with the Liquidating Trust before the deadline to

respond, then you must file and serve a written response (the “Response”) to the Objection in accordance with this Notice.

If you do not oppose the relief requested in the Objection, then you do not need to file a written Response to the Objection and you do not need to appear at the hearing.

Response Deadline: The Response Deadline is **4:00 p.m. (Eastern Time) on April 7, 2011 (the “Response Deadline”)**.

THE BANKRUPTCY COURT WILL ONLY CONSIDER YOUR RESPONSE IF YOUR RESPONSE IS FILED, SERVED AND RECEIVED BY THE RESPONSE DEADLINE.

Your Response will be deemed timely filed only if the Response is **actually received** on or before the Response Deadline by the Bankruptcy Court at the following address:

Clerk of the Bankruptcy Court
United States Bankruptcy Court
701 East Broad Street – Room 4000
Richmond, Virginia 23219

Your Response will be deemed timely served only if a copy of the Response is actually received on or before the Response Deadline by the Liquidating Trust’s attorneys:

Jeffrey N. Pomerantz, Esq.
Andrew W. Caine, Esq.
(admitted *pro hac vice*)
PACHULSKI STANG ZIEHL & JONES LLP
10100 Santa Monica Boulevard
Los Angeles, California 90067-4100
Telephone: (310) 277-6910
Telecopy: (310) 201-0760

Lynn L. Tavenner, Esq. (VA Bar No. 30083)
Paula S. Beran, Esq. (VA Bar No. 34679)
TAVENNER & BERAN, PLC
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219
Telephone: (804) 783-8300
Telecopy: (804) 783-0178

The status hearing on the Objection will be held at **2:00 p.m. (Eastern Time) on April 14, 2011 at:**

United States Bankruptcy Court
701 East Broad Street – Courtroom 5000
Richmond, Virginia 23219

If you file a timely Response, in accordance with the Objection Procedures, you do not need to appear at the status hearing on the Objection.

**Procedures for Filing a Timely Response and
Information Regarding the Hearing on the Objection**

Contents. To facilitate a speedy and non-judicial resolution of a Claim subject to the Objection, any claimant filing a Response shall use its best efforts to include the following (at a minimum) in its filed Response, to the extent such materials are not attached to its proof of claim:

- a. a caption setting forth the name of the Bankruptcy Court, the name of the Debtors, the case number and the title of the Objection to which the Response is directed;
- b. the claimant's name and an explanation for the amount of the Claim;
- c. a concise statement, executed by (or identifying by name, address and telephone number) a person with personal knowledge of the relevant facts that support the Response, setting forth the reasons why the Bankruptcy Court should overrule the Objection as to the claimant's claim, including, without limitation (to the extent not set forth in its proof of claim), the specific factual and legal bases upon which the claimant intends to rely in support of its Response and its underlying Claim;
- d. a copy of or identification of any other documentation or other evidence of the Claim, to the extent not already included with the Claim that the claimant presently intends to introduce into evidence in support of its Claim at the hearing; provided, however, that for a Response filed in support of a Claim arising out of a lease of real property, the Response need not attach such lease if the claimant indicates its willingness to provide such documentation upon request;
- e. a declaration of a person with personal knowledge of the relevant facts that support the Response;
- f. the claimant's address, telephone number and facsimile number and/or the name, address, telephone number and facsimile number of the claimant's attorney and/or designated representative to whom the attorneys for the Debtors should serve a reply to the Response, if any (collectively, the "Notice Address"). If a Response contains Notice Address that is different from the name and/or address listed on the Claim, the Notice Address will control and will become the service address for future service of papers with respect to all of the claimant's Claims listed in the Objection (including all Claims to be reduced or disallowed) and only for those Claims in the Objection; and
- g. to the extent such person differs from the person identified pursuant to subsection e, above, the name, address, telephone number, facsimile number, and electronic mail address of the representative of the claimant (which representative may be the claimant's counsel) party with authority to reconcile, settle or otherwise resolve the Objection on the claimant's behalf (collectively, the "Additional Addresses"). Unless the Additional

Addresses are the same as the Notice Addresses, the Additional Address will not become the service address for future service of papers.

Additional Information. To facilitate a resolution of the Objection, your Response should also include the name, address, telephone number and facsimile number of the party with authority to reconcile, settle or otherwise resolve the Objection on the claimant's behalf. Unless the Additional Addresses are the same as the Notice Addresses, the Additional Addresses will not become the service address for future service of papers.

Failure to File Your Timely Response. If you fail to file and serve your Response on or before the Response Deadline in compliance with the procedures set forth in this Notice, the Liquidating Trust will present to the Bankruptcy Court an appropriate order granting the relief requested in the Objection without further notice to you.

Each Objection Is a Contested Matter. Each Claim subject to the Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Bankruptcy Court will be deemed a separate order with respect to such claim.

Additional Information

Requests for Information. You may also obtain a copy of the Objection or related documents on the internet, by accessing the website of www.kccllc.net/circuitcity.

Reservation of Rights. Nothing in this Notice or the Objection constitutes a waiver of the Debtors' and/or the Trust's right to assert any claims, counterclaims, rights of offset or recoupment, preference actions, fraudulent-transfer actions or any other claims against you by the Liquidating Trust. Unless the Bankruptcy Court allows your Claims or specifically orders otherwise, the Liquidating Trust has the right to object on any grounds to the Claims (or to any other Claims or causes of action you may have filed or that have been scheduled by the Debtors) at a later date on any grounds or bases. In such event, you will receive a separate notice of any such objections.

Dated: February 23, 2011

/s/ Paula S. Beran

Lynn L. Tavenner (VA Bar No. 30083)
Paula S. Beran (VA Bar No. 34679)
TAVENNER & BERAN, P.L.C.
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219
Telephone: 804-783-8300
Facsimile: 804-783-0178
Email: ltavenner@tb-lawfirm.com
pberan@tb-lawfirm.com

-and-

Jeffrey N. Pomerantz (admitted *pro hac vice*)
Andrew W. Caine (admitted *pro hac vice*)
PACHULSKI STANG ZIEHL & JONES LLP
10100 Santa Monica Blvd.
11th Floor
Los Angeles, California 90067-4100
Telephone: 805-123-4567
Facsimile: 310/201-0760
E-mail: jpomerantz@pszjlaw.com
acaine@pszjlaw.com

*Counsel for the Circuit City Stores, Inc.
Liquidating Trust*

Jeffrey N. Pomerantz, Esq.
Andrew W. Caine, Esq.
(admitted *pro hac vice*)
PACHULSKI STANG ZIEHL & JONES LLP
10100 Santa Monica Boulevard
Los Angeles, California 90067-4100
Telephone: (310) 277-6910
Telecopy: (310) 201-0760

- and -

Robert J. Feinstein, Esq.
(admitted *pro hac vice*)
PACHULSKI STANG ZIEHL & JONES LLP
780 Third Avenue, 36th Floor
New York, New York 10017
Telephone: (212) 561-7700
Telecopy: (212) 561-7777

*Counsel to the Circuit City Stores, Inc.
Liquidating Trust*

Lynn L. Tavenner, Esq. (VA Bar No. 30083)
Paula S. Beran, Esq. (VA Bar No. 34679)
TAVENNER & BERAN, PLC
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219
Telephone: (804) 783-8300
Telecopy: (804) 783-0178

*Counsel to the Circuit City Stores, Inc.
Liquidating Trust*

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

-----	x	
In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., <u>et al.</u> ,	:	Case No. 08-35653 (KRH)
	:	
Debtors.	:	
-----	:	Jointly Administered
	x	

**LIQUIDATING TRUST'S FIRST OMNIBUS OBJECTION TO
LANDLORD CLAIMS (REDUCTION OF CERTAIN PARTIALLY
INVALID CLAIMS, RECLASSIFICATION OF CERTAIN
MISCLASSIFIED CLAIMS, DISALLOWANCE OF CERTAIN
INVALID CLAIMS, DISALLOWANCE OF CERTAIN LATE FILED
CLAIMS, AND DISALLOWANCE OF CERTAIN AMENDED CLAIMS)**

The Circuit City Stores, Inc. Liquidating Trust (the “Liquidating Trust”), through Alfred H. Siegel, the duly appointed trustee of the Trust (the “Trustee”), pursuant to the Second Amended Joint Plan of Liquidating of Circuit City Stores, Inc. and its Affiliated Debtors and Debtors in Possession and its Official Committee of Creditors Holding General Unsecured Claims (the “Plan”) in the above-captioned cases, hereby files this First Omnibus Objection to Landlord Claims (Reduction of Certain Partially Invalid Claims, Reclassification of Certain Misclassified Claims, Disallowance of Certain Invalid Claims, Disallowance of Certain of Late Filed Claims, Disallowance of Certain Amended Claims and Disallowance of Certain Invalid Claims) (the “Objection”), and hereby moves this court (the “Court”), pursuant to sections 105, 502 and 503 of title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (as amended, the “Bankruptcy Code”), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Local Bankruptcy Rule 3007-1, for an order, the proposed form of which is attached hereto as Exhibit A, granting the relief sought by this Objection, and in support thereof states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this Objection under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue of these cases and this Objection in this district is proper under 28 U.S.C. §§ 1408 and 1409. The statutory and legal predicates for the relief requested herein are Bankruptcy Code sections 105, 502 and 503, Bankruptcy Rule 3007 and Local Bankruptcy Rule 3007-1.

BACKGROUND

2. On November 10, 2008 (the “Petition Date”), the debtors in the

above-captioned cases (the “Debtors”)¹ filed voluntary petitions in this Court for relief under chapter 11 of the Bankruptcy Code.

3. On November 12, 2008, the Office of the United States Trustee for the Eastern District of Virginia appointed a statutory committee of unsecured creditors (the “Creditors’ Committee”).

4. On November 12, 2008, the Court appointed Kurtzman Carson Consultants LLC (“KCC”) as claims, noticing, and balloting agent for the Debtors in these chapter 11 cases pursuant to 28 U.S.C. § 156(c).

5. On December 10, 2008, the Court entered that certain Order Pursuant to Bankruptcy Code Sections 105 and 502 and Bankruptcy Rules 2002, 3003(c)(3), and 9007 (I) Setting General Bar Date and Procedures for Filing Proofs of Claim; and (II) Approving Form and Manner of Notice Thereof (Docket No. 890) (the “Claims Bar Date Order”).

6. Pursuant to the Claims Bar Date Order, the deadline for filing all “claims” (as defined in 11 U.S.C. § 105(5)) arising before November 10, 2008 against the Debtors by any non-governmental entity was 5:00 p.m. (Pacific) on January 30, 2009 (the “General Bar Date”). The deadline for governmental units to file claims that arose before November 10, 2009 was 5:00 p.m. (Pacific) on May 11, 2009 (the “Governmental Bar

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are as follows: Circuit City Stores, Inc. (3875), Circuit City Stores West Coast, Inc. (0785), InterTAN, Inc. (0875), Ventoux International, Inc. (1838), Circuit City Purchasing Company, LLC (5170), CC Aviation, LLC (0841), CC Distribution Company of Virginia, Inc. (2821), Circuit City Proper ties, LLC (3353), Kinzer Technology, LLC (2157), Abbott Advertising Agency, Inc. (4659), Patapsco Designs, Inc.(6796), Sky Venture Corp. (0311), PRAHS, Inc.(n/a), XSStuff, LLC (9263), Mayland MN, LLC (6116), Courchevel, LLC (n/a), Orbyx Electronics, LLC (3360), and Circuit City Stores PR, LLC (5512).

Date”). Pursuant to the Claims Bar Date Order, this Court approved the form and manner of the claims bar date notice, which was attached as Exhibit A to the Claims Bar Date Order (the “Claims Bar Date Notice”).

7. On December 17 and 19, 2008, KCC served a copy of the Claims Bar Date Notice on all parties who filed notices of appearance pursuant to Bankruptcy Rule 2002, all of the Debtors’ scheduled creditors in these cases, the Debtors’ equity holders, and certain other parties (Docket No. 1314). In addition, the Debtors published the Claims Bar Date Notice in The Wall Street Journal (Docket No. 1395) and The Richmond Times-Dispatch (Docket No. 1394).

8. On November 12, 2008, this Court entered that certain Order Establishing Bar Date for Filing Requests for Payment of Administrative Expense Claims Under Bankruptcy Code Sections 105 and 503(b)(9) and Approving Form, Manner and Sufficiency of Notice of the Bar Date Pursuant to Bankruptcy Rule 9007 (Docket No. 107)(the “503(b)(9) Bar Date Order”).

9. Pursuant to the 503(b)(9) Bar Date Order, this Court approved the form and manner of the 503(b)(9) bar date notice, which was attached as Exhibit A to the 503(b)(9) Bar Date Order (the “503(b)(9) Bar Date Notice”). Pursuant to the 503(b)(9) Bar Date Order and 503(b)(9) Bar Date Notice, the bar date for filing proofs of claim asserting administrative priority claims pursuant to section 503(b)(9) of the Bankruptcy Code was on December 19, 2008 (the “503(b)(9) Bar Date”).

10. On November 19, 2008, KCC served a copy of the 503(b)(9) Bar Date Notice on the 2002 Service List, all of the Debtors’ scheduled creditors in these cases, the Debtors’ equity holders, and certain other parties (Docket No. 358). In addition, the

Debtors published the 503(b)(9) Bar Date Notice in The New York Times (Docket No. 549), The Wall Street Journal (Docket No. 548), and The Richmond Times-Dispatch (Docket No. 547).

11. On January 16, 2009, the Court authorized the Debtors, among other things, to conduct going out of business sales at the Debtors' remaining 567 stores pursuant to an agency agreement (the "Agency Agreement") between the Debtors and a joint venture, as agent (the "Agent"). On January 17, 2009, the Agent commenced going out of business sales pursuant to the Agency Agreement at the Debtors remaining stores. As of March 8, 2009, the going out of business sales at the Debtors' remaining stores had been completed.

12. On April 1, 2009, this Court entered an Order Establishing Omnibus Objection Procedures and Approving the Form and Manner of Notice of Omnibus Objections (Docket No. 2881) (the "Omnibus Objection Procedures Order").

13. On May 15, 2009, the Court entered that certain Order Pursuant to Bankruptcy Code Sections 105 and 503 and Bankruptcy Rules 2002 and 9007 (i) Setting Administrative Bar Date and Procedures For Filing and Objecting To Administrative Expense Request and (ii) Approving Form and Manner of Notice Thereof (Docket No. 3354) (the "First Administrative Claims Bar Date Order").

14. Pursuant to the First Administrative Claims Bar Date Order, the deadline for filing all Administrative Expense Requests (as defined in the First Administrative Claims Bar Date Order) incurred in the period between November 10, 2008 and April 30, 2009 was 5:00 p.m. (Pacific) on June 30, 2009. Pursuant to the First Administrative Claims Bar Date Order, this Court approved the form and manner of the

claims bar date notice, which was attached as Exhibit A to the Administrative Claims Bar Date Order (the “Claims Bar Date Notice”).

15. On or before May 22, 2009, KCC served a copy of the Administrative Claims Bar Date Notice on all parties who filed notices of appearance pursuant to Bankruptcy Rule 2002, all of the Debtors’ scheduled creditors in these cases, the Debtors’ equity holders, and certain other parties (Docket Nos. 3397 and 4609). In addition, the Debtors published the Administrative Claims Bar Date Notice in The Financial Times (Docket No. 3970), The Richmond Times-Dispatch (Docket No. 3969) and The Wall Street Journal (Docket No. 3968).

16. On February 18, 2010, the Court entered that certain Order Pursuant to Bankruptcy Code Sections 105 and 503 and Bankruptcy Rules 2002 and 9007 (i) Setting Second Administrative Bar Date and Procedures For Filing and Objecting To Administrative Expense Request and (ii) Approving Form and Manner of Notice Thereof (Docket No. 6555) (the “Second Administrative Claims Bar Date Order”).

17. Pursuant to the Second Administrative Claims Bar Date Order, the deadline for filing all Administrative Expense Requests for the period May 1, 2009 through December 31, 2009 (as defined in the Administrative Claims Bar Date Order) was 5:00 p.m. (Pacific) on March 31, 2010. Pursuant to the Second Administrative Claims Bar Date Order, this Court approved the form and manner of the claims bar date notice, which was attached as Exhibit A to the Second Administrative Claims Bar Date Order (the “Claims Bar Date Notice”).

18. On or before February 25, 2010, KCC served a copy of the Second Administrative Claims Bar Date Notice on all parties who filed notices of appearance

pursuant to Bankruptcy Rule 2002, all of the Debtors' scheduled creditors in these cases, the Debtors' equity holders, and certain other parties (Docket No. 6705). Supplemental service of the Second Administrative Bar Date Notice was provided by overnight mail to one party, Brockton Superior Court, on March 26, 2010 (Docket Nos. 7089 and 7535). In addition, the Debtors published the Administrative Claims Bar Date Notice in The Financial Times (Docket No. 6719), The Richmond Times-Dispatch (Docket No. 6717) and The Wall Street Journal (Docket No. 6718).

19. On August 9, 2010, the Debtors and the Creditors' Committee filed the Plan, which provides for the liquidation of the Debtors' assets and distribution of the proceeds thereof under chapter 11 of the Bankruptcy Code.

20. On September 10, 2010, the United States Bankruptcy Court, Eastern District of Virginia, signed an Order confirming the Plan.

21. The Plan became effective on November 1, 2010 (the "Effective Date"), and pursuant to the Plan and Liquidating Trust Agreement approved therewith, the Liquidation Trust assumed the right and responsibility to liquidate the Debtors' remaining assets and distribute the proceeds to creditors, including the prosecution of Causes of Action and objections to claims.

OBJECTIONS TO CLAIMS

22. By this Objection, the Liquidating Trust seeks entry of an order, in substantially the form attached hereto as Exhibit A, pursuant to Bankruptcy Code sections 105(a), 502 and 503, Bankruptcy Rule 3007 and Local Bankruptcy Rule 3007-1, (i) reducing each of the claims identified on Exhibit C attached hereto, (ii) reclassifying each of the claims on Exhibit D attached hereto, and (iii) disallowing each of the claims

identified on Exhibit E through Exhibit G attached hereto (collectively, the “Claims”) for the reasons set forth below.

23. For ease of reference, attached hereto as Exhibit B is an alphabetical listing of all claimants whose Claims are included in this Objection (the “Claimants”), with a cross-reference by claim number.

A. Reduction of Certain Partially Invalid Claims

24. The basis for reduction of the claims listed on Exhibit C attached hereto (the “Partially Invalid Claims”) is that all of the Partially Invalid Claims assert, in part, amounts for which the Debtors are not liable.

25. Specifically, after a review of the Partially Invalid Claims and the bases upon which each is asserted, and a review of the Debtors’ books and records, the Liquidating Trust has determined that certain portions of the Partially Invalid Claims are (i) liabilities already asserted by the Claimants in other claims; (ii) liabilities that have already been satisfied by the Debtors; or (iii) liabilities for which the Debtors dispute liability. Accordingly, the Liquidating Trust requests that the Partially Invalid Claims identified on Exhibit C be reduced in the manner stated in Exhibit C for the reasons stated therein.

B. Reclassification of Certain Misclassified Claims

26. The basis for reduction of the claims listed on Exhibit D attached hereto (the “Misclassified Claims”) is that the Misclassified Claims are improperly classified.

27. Specifically, after a review of the Misclassified Claims, the bases upon which each is asserted, and a review of the Debtors’ books and records, the

Liquidating Trust submits that the Misclassified Claims are asserted, in whole or in part, with incorrect classifications and should be reclassified. Accordingly, the Liquidating Trust requests that each Misclassified Claim identified on Exhibit D be reclassified in the manner set forth in Exhibit D.

C. Disallowance of Certain Invalid Claims

28. The basis for disallowance of the claims listed on Exhibit E attached hereto (the “Invalid Claims”) is that all of the Invalid Claims assert, in their entirety, amounts for which the Debtors are not liable.

29. Specifically, after a review of the Invalid Claims and the bases upon which each is asserted, and a review of the Debtors’ books and records, the Liquidating Trust has determined that the Invalid Claims are based on liabilities already asserted by the Claimants in other claims (i) liabilities that already have been satisfied by the Debtors, or (ii) liabilities for which the Debtors dispute any liability. Accordingly, the Liquidating Trust requests that the Invalid Claims identified on Exhibit E be disallowed for the reasons stated therein.

D. Disallowance of Certain Late Filed Claims

30. The basis for disallowance of the claims listed on Exhibit F attached hereto (the “Late-Filed Claims”) is that each such claim was filed after the relevant bar date. The disallowance of each of the Late-Filed Claims set forth on Exhibit F is appropriate under the appropriate Bar Date Order as well as under applicable law.

31. Bar dates for asserting claims in chapter 11 bankruptcy cases serve extremely important purposes. “The requirement of a Bar Date in Chapter 11 enables the debtor...to establish the universe of claims with which it must deal and the amount of

those claims.” See In re A.H. Robins Co., Inc., 129 B.R. 457, 459 (Bankr. E.D. Va. 1991). Premised on the imperative purpose of finality of asserting claims against a debtor, courts have not allowed claims filed by creditors after the bar date, absent special circumstances. See In re Provident Hosp., Inc., 122 B.R. 683, 685 (D. Md. 1990), aff’d, 943 F.2d 49 (4th Cir. 1991) (unpublished opinion) (“Because Bean did not timely file his bankruptcy claim after having been given constitutionally sufficient notice, his claim is barred under well-settled authority, 11 U.S.C. 1141(d) and Bankruptcy Rule 3003 (c) (2).”).

32. Each Late-Filed Claim was filed in the present cases after the applicable bar date had passed. Accordingly, pursuant to the applicable Bar Date Order, these Claims are “forever barred, estopped, and permanently enjoined from asserting such claim against the Debtors...”

33. It is essential for the Liquidating Trust to establish the proper liabilities asserted against the Debtors. In order to achieve the imperative of finality in the claims process, the Liquidating Trust requests that this Court disallow the Claims in their entirety and for all purposes in these bankruptcy cases.

E. Disallowance of Certain Amended Claims

34. Exhibit G contains a list of claims that have been rendered moot by the claimant filing a subsequent “amending” claim that supersedes the claim listed on Exhibit G (the Amended Claims”).

35. The Liquidating Trust objects to the Amended Claims, because, among other reasons, the same claimant subsequently filed an amended claim, the amount and basis of which are the subject of the Amended Claim. Such repetitive claims should be disallowed. The Amended Claims listed on Exhibit G under “Claim to be Disallowed”

should be disallowed for all purposes in these bankruptcy cases. The claims listed as “Surviving Claim” on Exhibit G hereto (the “Surviving Superseding Claims”) shall remain in effect and are not affected by this portion of this Objection; provided, however, that such Surviving Superseding Claims may be the subject of another section of this Objection or a separate subsequently filed objection.

RESERVATION OF RIGHTS

36. At this time, the Liquidating Trust has not completed its review of the validity of all claims/expenses filed against the Debtors’ estates, including the Claims objected to herein. Accordingly, any of the Claims objected to herein may be the subject of other bases for objection herein and/or additional subsequently filed objections on any grounds that bankruptcy law or non-bankruptcy law permits. To that end, the Liquidating Trust reserves the right to further object to any and all claims, whether or not the subject of this Objection, for allowance and/or distribution purposes, and on any other grounds. Furthermore, the Liquidating Trust reserves the right to modify, supplement and/or amend this Objection as it pertains to any Claim or claimant herein.

NOTICE AND PROCEDURE

37. Notice of this Objection has been provided to all Claimants with Claims that are the subject to this Objection as identified on Exhibit C through Exhibit G, respectively, and to parties-in-interest in accordance with the Court’s Supplemental Order Pursuant to Bankruptcy Code Sections 102 and 105, Bankruptcy Rules 2002 and 9007, and Local Bankruptcy Rules 2002-1 and 9013-1 Establishing Certain Notice, Case Management and Administrative Procedures (entered on December 30, 2009 at Docket No. 6208) (the “Case Management Order”). The Liquidating Trust submits that the following

methods of service upon the Claimants should be deemed by the Court to constitute due and sufficient service of this Objection: (a) service in accordance with Federal Rule of Bankruptcy Procedure 7004 and the applicable provisions of Federal Rule of Civil Procedure 4; (b) to the extent counsel for a Claimant is not known to the Liquidating Trust, by first class mail, postage prepaid, on the signatory of the Claimant's proof of claim form or other representative identified in the proof of claim form or any attachment thereto; or (c) by first class mail, postage prepaid, on any counsel that has appeared on the Claimant's behalf in the Debtors' bankruptcy cases. The Liquidating Trust is serving the Claimant with this Objection and the exhibit on which the Claimant's claim is listed.

38. To the extent any Claimant timely files and properly serves a response to this Objection by **4:00 P.M. (Eastern) on April 7, 2011** as required by the Case Management Order and under applicable law, and the parties are unable to otherwise resolve the Objection, the Liquidating Trust requests that the Court conduct a status conference² with respect to any such responding claimant at **2:00 P.M. (Eastern) on April 14, 2011** and thereafter schedule the matter for a future hearing as to the merits of such claim. However, to the extent any Claimant fails to timely file and properly serve a response to this Objection as required by the Case Management Order and applicable law, the Liquidating Trust requests that the Court enter an order, substantially in the form attached hereto as Exhibit A, reducing the Partially Invalid Claims set forth on Exhibit C, Reclassifying the Misclassified Claims set forth on Exhibit D, and disallowing the invalid, late filed, and amended claims set forth on Exhibit E through Exhibit G attached hereto.

**COMPLIANCE WITH BANKRUPTCY RULE 3007 AND
THE OMNIBUS OBJECTION PROCEDURES ORDER**

39. This Objection complies with Bankruptcy Rule 3007(e).

Additionally, the Liquidating Trust submits that this Objection is filed in accordance with the Omnibus Objection Procedures Order.

WAIVER OF MEMORANDUM OF LAW

40. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in the Motion, the Liquidating Trust requests that the requirement that all motions be accompanied by a written memorandum of law be waived.

NO PRIOR RELIEF

41. No previous request for the relief sought herein has been made to this Court or any other court.

(continued on next page)

² In accordance with the Omnibus Objection Procedures Order, Claimants who timely respond to the Objection do not need to appear at the status conference.

WHEREFORE, the Liquidating Trust respectfully requests that the Court enter an Order sustaining this Objection and granting such other and further relief as the Court deems appropriate.

Dated: Richmond, Virginia
February 23, 2011

TAVENNER & BERAN, PLC

/s/ Paula S. Beran

Lynn L. Tavenner (VA Bar No. 30083)
Paula S. Beran (VA Bar No. 34679)
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219
(804) 783-8300

- and -

PACHULSKI STANG ZIEHL & JONES LLP
Jeffrey N. Pomerantz, Esq.
Andrew W. Caine, Esq.
10100 Santa Monica Boulevard
Los Angeles, California 90067-4100
(310) 277-6910

- and -

PACHULSKI STANG ZIEHL & JONES LLP
Robert J. Feinstein, Esq.
780 Third Avenue, 36th Floor
New York, New York 10017
(212) 561-7700

*Counsel to the Circuit City Stores, Inc.
Liquidating Trust*

EXHIBIT A

Jeffrey N. Pomerantz, Esq.
Andrew W. Caine, Esq.
(admitted *pro hac vice*)
PACHULSKI STANG ZIEHL & JONES LLP
10100 Santa Monica Boulevard
Los Angeles, California 90067-4100
Telephone: (310) 277-6910
Telecopy: (310) 201-0760

Lynn L. Tavenner, Esq. (VA Bar No. 30083)
Paula S. Beran, Esq. (VA Bar No. 34679)
TAVENNER & BERAN, PLC
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219
Telephone: (804) 783-8300
Telecopy: (804) 783-0178

- and -

Robert J. Feinstein, Esq.
(admitted *pro hac vice*)
PACHULSKI STANG ZIEHL & JONES LLP
780 Third Avenue, 36th Floor
New York, New York 10017
Telephone: (212) 561-7700
Telecopy: (212) 561-7777

Counsel to the Liquidating Trustee

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

-----	x	
In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., <u>et al.</u> ,	:	Case No. 08-35653 (KRH)
	:	
Debtors.	:	
-----	:	Jointly Administered
	x	

**ORDER SUSTAINING LIQUIDATING TRUST'S FIRST OMNIBUS
OBJECTION TO LANDLORD CLAIMS (REDUCTION OF CERTAIN
PARTIALLY INVALID CLAIMS, RECLASSIFICATION OF CERTAIN
MISCLASSIFIED CLAIMS, DISALLOWANCE OF CERTAIN INVALID CLAIMS,
DISALLOWANCE OF CERTAIN LATE-FILED CLAIMS,
AND DISALLOWANCE OF CERTAIN AMENDED CLAIMS)**

THIS MATTER having come before the Court¹ on the Liquidating Trust's First Omnibus Objection to Landlord Claims (Reduction of Certain Partially Invalid Claims, Reclassification of Certain Misclassified Claims, Disallowance of Certain Invalid Claims, Disallowance of Certain of Late Filed Claims, and Disallowance of Certain Amended Claims) (the "Objection"), which requested, among other things, that the claims specifically identified on Exhibit C through Exhibit G attached to the Objection be reduced or disallowed for those reasons set forth in the Objection; and it appearing that due and proper notice and service of the Objection as set forth therein was good and sufficient and that no other further notice or service of the Objection need be given; and it further appearing that no response was timely filed or properly served by the Claimants being affected by this Order; and it appearing that the relief requested on the Objection is in the best interest of the Liquidating Trust, the Debtors' estates and creditors and other parties-in-interest; and after due deliberation thereon good and sufficient cause exists for the granting of the relief as set forth herein,

IT IS HEREBY ORDERED ADJUDGED AND DECREED THAT:

1. The Objection is SUSTAINED.
2. The Claims identified on Exhibit A as attached hereto and incorporated herein are forever reduced for all purposes in these bankruptcy cases in the manner stated in Exhibit A.
3. The Claims identified on Exhibit B as attached hereto and incorporated herein are forever reclassified in these bankruptcy cases in the manner stated

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Objection.

in Exhibit B.

4. The Claims identified on Exhibit C through Exhibit E as attached hereto and incorporated herein are forever disallowed in their entirety for all purposes in these bankruptcy cases.

5. The Liquidating Trust's rights to object to any claim including (without limitation) the Claims subject to the Objection, on any grounds that applicable law permits, are not waived and are expressly reserved.

6. The Liquidating Trust shall serve a copy of this Order on the claimants included on the exhibits to this Order on or before five (5) business days from the entry of this Order.

7. This Court shall retain jurisdiction to hear and determine all matters arising from or relating to this Order.

Dated: Richmond, Virginia
_____, 2011

HONORABLE KEVIN R. HUENNEKENS
UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

TAVENNER & BERAN, PLC

Lynn L. Tavenner (VA Bar No. 30083)
Paula S. Beran (VA Bar No. 34679)
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219
(804) 783-8300

- and -

PACHULSKI STANG ZIEHL & JONES LLP
Jeffrey N. Pomerantz, Esq.
Andrew W. Caine, Esq.
10100 Santa Monica Boulevard
Los Angeles, California 90067-4100
(310) 277-6910

- and -

PACHULSKI STANG ZIEHL & JONES LLP
Robert J. Feinstein, Esq.
780 Third Avenue, 36th Floor
New York, New York 10017
(212) 561-7700

*Counsel to the Circuit City Stores, Inc.
Liquidating Trust*

CERTIFICATION OF ENDORSEMENT UNDER LOCAL RULE 9022-1(C)

Pursuant to Local Bankruptcy Rule 9022-1(C), I hereby certify that the foregoing proposed order has been endorsed by or served upon all necessary parties.

/_____
Lynn L. Tavenner

In re Circuit City Stores, et al.

Case No. 08-35653 (KRH)

Exhibit B

ALPHABETICAL LISTING OF CLAIMANTS

Claim Holder	Claim	Exhibit
Acadia Realty Limited Partnership & Brighton Commercial LLC & Catellus Operating Limited Partnership & Cedar Development Ltd. Attn: Jennifer M. McLemore & Augustus C Epps Jr. & Michael D. Mueller Esq. & Noelle M. James Esq. c/o Christian & Barton 909 E. Main Ste. 1200 Richmond, VA 23219	13098	Exhibit E INVALID CLAIMS TO BE EXPUNGED
AIG Baker Hoover LLC Attn: Legal Dept. 1701 Lee Branch Ln Birmingham, AL 35242	4080	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Bank of America National Association Successor by Merger to LaSalle Bank National Association Attn Diane Schapiro c o Berkadia Commercial Mortgage LLC 700 N Pearl St Ste 2200 Dallas, TX 75201	12663	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Buckhead Triangle LP c o Liquidity Solutions Inc One University Plz Ste 312 Hackensack, NJ 07601	10534	Exhibit F LATE FILED CLAIMS TO BE EXPUNGED
Capmark Finance Inc Keith M Aurzada & John C Leininger Bryan Cave LLP 2200 Ross Ave Ste 3300	14363	Exhibit E INVALID CLAIMS TO BE EXPUNGED
Carolina Pavilion Company c o Amy Pritchard Williams Esq K&L Gates LLP 214 N Tryon St Hearst Tower 47th Fl Charlotte, NC 28202	12915	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Carolina Pavilion Company c o Amy Pritchard Williams Esq K&L Gates LLP 214 N Tryon St Hearst Tower 47th Fl Charlotte, NC 28202	14137	Exhibit E INVALID CLAIMS TO BE EXPUNGED

Claim Holder	Claim	Exhibit
Centro Properties Group ta Memphis Commons Memphis TN c o David L Pollack Ballard Spahr Andrews & Ingersoll LLP 1735 Market St 51st Fl Philadelphia, PA 19103	12560	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Centro Properties Group ta Memphis Commons Memphis TN c o David L Pollack Ballard Spahr Andrews & Ingersoll LLP 1735 Market St 51st Fl Philadelphia, PA 19103	12559	Exhibit E INVALID CLAIMS TO BE EXPUNGED
Centro Properties Group ta Pensacola Square c/o David L. Pollack Ballard Spahr Andrews & Ingersoll LLP 1735 Market St. 51st Fl. Philadelphia, PA 19103	12633	Exhibit E INVALID CLAIMS TO BE EXPUNGED
Centro Properties Group ta Pensacola Square Pensacola FL c/o David L. Pollack Ballard Spahr Andrews & Ingersoll LLP 1735 Market St. 51st Fl. Philadelphia, PA 19103	12625	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Centro Properties Group ta Sharpstown Plaza Houston Tx c/o David L. Pollack Ballard Spahr Andrews & Ingersoll LLP 1735 Market St. 51st. Fl. Philadelphia, PA 19103	8488	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Centro Properties Group ta Sharpstown Plaza Houston Tx c/o David L. Pollack Ballard Spahr Andrews & Ingersoll LLP 1735 Market St. 51st. Fl. Philadelphia, PA 19103	8491	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
CHK LLC Augustus C Epps Jr Esq Christian & Barton LLP 909 E Main St Ste 1200 Richmond, VA 23219	14346	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS

Claim Holder	Claim	Exhibit
Circuit Investors #2 Ltd. A Texas Partnership c/o Niclas A. Ferland, Esq. LeClairRyan, A Professional Corporation 555 Long Wharf Drive, 8th Floor New Haven, CT 06511	9037	Exhibit G AMENDED CLAIMS TO BE EXPUNGED
Crossroads Associates, Ltd. Kitchens Kelley Gaynes PC 3495 Piedmont Road, NE Building 11, Suite 900 Atlanta, GA 30305	12496	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Crossroads Associates, Ltd. Kitchens Kelley Gaynes PC 3495 Piedmont Road, NE Building 11, Suite 900 Atlanta, GA 30305	13721	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
DEV Limited Partnership c/o William A. Gray Esq. & C Thomas Ebel Esq. Sands Anderson Marks & Miller PC 801 E. Main St. Ste. 1800 PO Box 1998 Richmond, VA 23218-1998	13924	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Drexel Delaware Trust c o Midland Loan Services Inc a Delaware Corporation c o Katharine Battaia Thompson and Knight LLP 1722 Routh St Ste 1500 Dallas, TX 75201	12647	Exhibit E INVALID CLAIMS TO BE EXPUNGED
Drexel Delaware Trust c/o Midland Loan Services Inc., a Delaware corporation c/o Katharine Battaia Thompson and Knight LLP 1722 Routh St. Ste 1500 Dallas, Tx 75201	14347	Exhibit E INVALID CLAIMS TO BE EXPUNGED
GECCMC 2005 C2 South Lindbergh LLC c/o Mindy A. Mora, Esq. Bilzin Sumberg Baena Price & Axelrod LLP 200 S. Biscayne Blvd. Ste 2500 Miami, FL 33131	12180	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS

Claim Holder	Claim	Exhibit
GECCMC 2005 C2 South Lindbergh LLC (Transferee) c/o Mindy A. Mora, Esq. Bilzin Sumberg Baena Price & Axelrod LLP 200 S. Biscayne Blvd. Ste 2500 Miami, FL 33131	14420	Exhibit F LATE FILED CLAIMS TO BE EXPUNGED
GECCMC 2005-C2 CC Parent, LLC (Transferee) c/o Mindy A. Mora, Esq. Bilzin Sumberg Baena Price & Axelrod LLP 200 South Biscayne Blvd., Suite 2500 Miami, FL 33131	14418	Exhibit F LATE FILED CLAIMS TO BE EXPUNGED
Gravois Bluffs III LLC John E Hilton Carmody MacDonald PC 120 S Central Ste 1800 Clayton, MO 63105	13633	Exhibit G AMENDED CLAIMS TO BE EXPUNGED
Gravois Bluffs III, LLC John E Hilton Carmody MacDonald PC 120 S Central Ave Ste 1800 St Louis, MO 63105	14425	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Gravois Bluffs III, LLC John E Hilton Carmody MacDonald PC 120 S Central Ave Ste 1800 St Louis, MO 63105	14427	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
GRI EQY Sparkleberry Square LLC Arthur L. Gallagher Vice President 1600 NE Miami Gardens Dr. North Miami Beach, FL 33179	14062	Exhibit E INVALID CLAIMS TO BE EXPUNGED
Gri Eqty Sparkleberry Square LLC Augustus C. Epps Jr. Esq. Christian & Barton LLP 909 E. Main St. Ste 1200 Richmond, VA 23219-3095	12759	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Hagan Properties, Inc. Eighth & Main Building 707 E. Main Street, Suite 1700 Richmond, VA 23218-1558	13101	Exhibit E INVALID CLAIMS TO BE EXPUNGED
Jefferson Mall Company II LLC c/o Scott M. Shaw Esq. Husch Blackwell Sanders LLP 2030 Hamilton Pl. Blvd. Ste. 150 Chattanooga, TN 37421	14477	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS

Claim Holder	Claim	Exhibit
Kimco North Rivers 692 Inc Attn Neil E Herman Esq c o Morgan Lewis & Bockius LLP 101 Park Ave NY, NY 10178	11940	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Kimco North Rivers 692 Inc c o Morgan Lewis & Bockius LLP 101 Park Ave NY, NY 10178	11923	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Liquidity Solutions Inc. (Transferee) One University Plz Ste 312 Hackensack, NJ 07601	12812	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Midland Loan Services Inc c o Katharine Battaia Thompson and Knight LLP 1722 Routh St Ste 1500 Dallas, TX 75201	12258	Exhibit E INVALID CLAIMS TO BE EXPUNGED
Park National Bank c/o Woods Rogers PLC, Attn: Richard C. Maxwell 10 S. Jefferson Street, Suite 1400 Roanoke, VA 24011	11749	Exhibit G AMENDED CLAIMS TO BE EXPUNGED
Parker Central Plaza Ltd. c/o Lynnette R. Warman Hunton & Williams LLP 1445 Ross Ave. Ste. 3700 Dallas, Tx 75202	12761	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Parker Central Plaza Ltd. Henry Toby P. Long III & Thomas N. Jamerson Hunton & Williams LLP Riverfront Plz E. Tower 951 E. Byrd St. Richmond, VA 23219-4074	14389	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Parker Central Plaza Ltd. Henry Toby P. Long III & Thomas N. Jamerson Hunton & Williams LLP Riverfront Plz E. Tower 951 E. Byrd St. Richmond, VA 23219-4074	14389	Exhibit D MISSCLASSIFIED CLAIMS
RLV Village Plaza, LP David M. Blau, Esq. Kupelian, Ormond & Magy, P.C. 25800 Northwestern Highway, Suite 950 Southfield, MI 48075	12593	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS

Claim Holder	Claim	Exhibit
Saul Holdings Limited Partnership Matthew M Moore & Stephen A Metz Shulman Rogers Gandal Pordy & Ecker PA 11921 Rockville Pike Ste 300 Rockville, MD 20852-2743	13673	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Saul Holdings Limited Partnership Stephen A Metz Esq Shulman Rogers Gandal Pordy & Ecker PA 11921 Rockville Pike 3rd Fl Rockville, MD 20852	12223	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
THF Chesterfield Two Development LLC THF Clarksburg Development One LLC THF Harrisonburg Crossing LLC THF ONC Development LLC Stephan W. Milo Wharton Aldhizer and Weaver PLC 125 S. Augusta St. Ste. 2000 Staunton, VA 24401	12397	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Thirty & 141 LP John E. Hilton 120 S. Central Ave. Ste. 1800 St. Louis, MO 63105	7166	Exhibit G AMENDED CLAIMS TO BE EXPUNGED
Tutwiler Properties Ltd c o Heather A Lee Burr & Forman LLP 420 N 20th St Ste 3400 Birmingham, AL 35203	9643	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
U.S. Bank National Association, as purchaser of assets of Park National Bank c/o Woods Rogers PLC, Attn: Richard C. Maxwell 10 S. Jefferson Street Suite 1400 Roanoke, VA 24011	14797	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
US 41 & I 285 Company Attn Neil E Herman Esq c o Morgan Lewis & Bockius LLP 101 Park Ave New York, NY 10178	8720	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Valley View S. C. LLC Attn: Neil E. Herman c/o Morgan Lewis & Bockius LLP 101 Park Ave. New York, NY 10178	11963	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS

Claim Holder	Claim	Exhibit
Valley View SC LLC Attn Neil E Herman c o Morgan Lewis & Bockius LLP 101 Park Ave New York , NY 10178	12003	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Weingarten Nostat Inc. Attn: Jenny J. Hyun Esq. c/o Weingarten Realty Investors Houston, TX 77008 2600 Citadel Plz Dr. Ste. 125	12741	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Weingarten Nostat Inc. Attn: Lisa L. Seabron c/o Weingarten Realty Investors 2600 Citadel Plz Dr. Ste. 125 Houston, TX 77008	13984	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS
Wells Fargo Bank, NA, as Trustee for the Registered Holders of CD 2006- CD2 Commercial Mortgage Pass- Through Certificates as Collateral Assignee of RLV Village Plaza LP Mindy A. Mora, Esq. Bilzin, Sumberg, Baena, Price & Axelrod, LLP 200 S. Biscayne Blvd., Suite 2500 Miami, FL 33131	8922	Exhibit E INVALID CLAIMS TO BE EXPUNGED
WRI Camp Creek Marketplace II LLC Attn: James S. Carr & Robert L. LeHane Kelley Drye & Warren LLP 101 Park Ave. New York, NY 10178	13987	Exhibit E INVALID CLAIMS TO BE EXPUNGED
WRI Camp Creek Marketplace II LLC Attn: Jenny J. Hyun Esq. c/o Weingarten Realty Investors 2600 Citadel Plaza Dr. Ste. 125 Houston, TX 77008	9718	Exhibit C REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS

In re Circuit City Stores, Inc, et al
Case No. 08-35653 (KRH)

Exhibit C

REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS

BOOKS AND RECORDS CLAIMS TO BE REDUCED						MODIFIED CLAIMS		
Date Filed	Claim Number	Name & Address	Additional Notice Address	Claim Amount	Debtor	Proposed Modified Claim	Debtor	Comments
1/21/2009	4080	AIG Baker Hoover LLC Attn: Legal Dept. 1701 Lee Branch Ln Birmingham, AL 35242		\$117,924.24 (general unsecured)	Circuit City Stores, Inc.	\$108,494.61 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$9,429.63 for prepetition taxes in accordance with the Debtors' books and records.
4/30/2009	12663	Bank of America National Association Successor by Merger to LaSalle Bank National Association Attn Diane Schapiro c o Berkadia Commercial Mortgage LLC 700 N Pearl St Ste 2200 Dallas, TX 75201		\$1,316,782.37 (general unsecured)	Circuit City Stores, Inc.	\$1,181,915.15 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$55,983.38 for prepetition rent and \$50,333.47 for rejection damages in accordance with the Debtors' books and records. Reduce by \$15,257.55 for attorney fees and \$2,442.67 for damages because the Debtors' are not liable under the lease. Reduce by \$10,850.15 for insurance because the Debtors were responsible for and maintained insurance on the location prior to rejection of the lease.
4/30/2009	12915	Carolina Pavilion Company c o Amy Pritchard Williams Esq K&L Gates LLP 214 N Tryon St Hearst Tower 47th Fl Charlotte, NC 28202		\$739,660.35 (\$698,676.25 is general unsecured and \$40,984.10 is administrative)	Circuit City Stores, Inc.	\$698,093.13 (general unsecured) \$38,448.37 (administrative)	Circuit City Stores, Inc.	Reduce by \$583.12 for rejection damages and \$2,535.73 for November stub rent in accordance with the Debtors' books and records.
4/30/2009	12560	Centro Properties Group ta Memphis Commons Memphis TN c o David L Pollack Ballard Spahr Andrews & Ingersoll LLP 1735 Market St 51st Fl Philadelphia, PA 19103		\$1,065,758.10 (general unsecured)	Circuit City Stores, Inc.	\$814,406.34 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$141,758.08 for prepetition rent and \$109,593.68 for rejection damages in accordance with the Debtors' books and records.

In re Circuit City Stores, Inc, et al
Case No. 08-35653 (KRH)

Exhibit C

REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS

BOOKS AND RECORDS CLAIMS TO BE REDUCED						MODIFIED CLAIMS		
Date Filed	Claim Number	Name & Address	Additional Notice Address	Claim Amount	Debtor	Proposed Modified Claim	Debtor	Comments
4/30/2009	12625	Centro Properties Group ta Pensacola Square Pensacola FL c/o David L. Pollack Ballard Spahr Andrews & Ingersoll LLP 1735 Market St. 51st Fl. Philadelphia, PA 19103		\$490,718.28 (general unsecured)	Circuit City Stores, Inc.	\$359,024.98 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$62,887.28 for prepetition rent and \$68,806.02 for rejection damages in accordance with the Debtors' books and records.
1/29/2009	8488	Centro Properties Group ta Sharpstown Plaza Houston Tx c/o David L. Pollack Ballard Spahr Andrews & Ingersoll LLP 1735 Market St. 51st Fl. Philadelphia, PA 19103		\$646,816.60 (general unsecured)	Circuit City Stores, Inc.	\$626,785.75 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$12,171.46 for rejection damages, \$2,222.94 for prepetition taxes and \$5,636.45 for prepetition ins. in accordance with the Debtors' books and records.
1/29/2009	8491	Centro Properties Group ta Sharpstown Plaza Houston Tx c/o David L. Pollack Ballard Spahr Andrews & Ingersoll LLP 1735 Market St. 51st Fl. Philadelphia, PA 19103		\$10,602.16 (administrative)	Circuit City Stores, Inc.	\$9,266.84 (administrative)	Circuit City Stores, Inc.	Reduce by \$398.91 for postpetition taxes and \$936.41 for postpetition insurance in accordance with the Debtors' books and records.
6/30/2009	14346	CHK LLC Augustus C Epps Jr Esq Christian & Barton LLP 909 E Main St Ste 1200 Richmond, VA 23219	CHK LLC 12 Deep Well Los Altos, CA 94022	\$97,201.72 (administrative)	Circuit City Stores, Inc.	\$80,397.66 (administrative)	Circuit City Stores, Inc.	Reduce by \$1,546.51 for post petition taxes in accordance with the Debtors' books and records. Reduce further by \$15,257.55 because the Debtors' are not liable under the lease..

In re Circuit City Stores, Inc, et al
Case No. 08-35653 (KRH)

Exhibit C

REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS

BOOKS AND RECORDS CLAIMS TO BE REDUCED						MODIFIED CLAIMS		
Date Filed	Claim Number	Name & Address	Additional Notice Address	Claim Amount	Debtor	Proposed Modified Claim	Debtor	Comments
4/29/2009	12496	Crossroads Associates, Ltd. Kitchens Kelley Gaynes PC 3495 Piedmont Road, NE Building 11, Suite 900 Atlanta, GA 30305		\$800,610.75 (general unsecured)	Circuit City Stores, Inc.	\$744,530.69 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$37,670.43 for November stub rent and \$14,184.79 for postpetition taxes, which are both covered by claim 13721, \$3,000 for other damages and \$1,224.84 for other water in accordance with the Debtors' books and records.
6/30/2009	13721	Crossroads Associates, Ltd. Kitchens Kelley Gaynes PC 3495 Piedmont Road, NE Building 11, Suite 900 Atlanta, GA 30305		\$138,689.04 (administrative)	Circuit City Stores, Inc.	\$48,809.89 (administrative)	Circuit City Stores, Inc.	Reduce by \$85,654.31 for prepetition taxes, which are covered by claim 12496, \$3,000 for other damages and \$1,224.84 for other water in accordance with the Debtors' books and records.
6/29/2009	13924	DEV Limited Partnership c/o William A. Gray Esq. & C Thomas Ebel Esq. Sands Anderson Marks & Miller PC 801 E. Main St. Ste. 1800 PO Box 1998 Richmond, VA 23218-1998		\$29,983.21 (administrative)	Circuit City Stores, Inc.	\$22,922.85 (administrative)	Circuit City Stores, Inc.	Reduce by \$3,060.36 for administrative rent and \$4,000 for attorney fees in accordance with the Debtors' books and records.
4/14/2009	12180	GEPMC 2005 C2 South Lindbergh LLC c/o Mindy A. Mora, Esq. Bilzin Sumberg Baena Price & Axelrod LLP 200 S. Biscayne Blvd. Ste 2500 Miami, FL 33131	OLP CCST Louis LLC c/o Michelle McMahon, Esq. 1290 Avenue of the Americas New York, NY 10104	\$358,657.10 (general unsecured)	Circuit City Stores, Inc.	\$336,189.53 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$22,467.57 for rejection damages in accordance with the Debtors' books and records.

In re Circuit City Stores, Inc, et al
Case No. 08-35653 (KRH)

Exhibit C

REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS

BOOKS AND RECORDS CLAIMS TO BE REDUCED						MODIFIED CLAIMS		
Date Filed	Claim Number	Name & Address	Additional Notice Address	Claim Amount	Debtor	Proposed Modified Claim	Debtor	Comments
6/29/2009	14425	Gravois Bluffs III, LLC John E Hilton Carmody MacDonald PC 120 S Central Ave Ste 1800 St Louis, MO 63105		\$54,983.80 (administrative)	Circuit City Stores, Inc.	\$48,929.43 (administrative)	Circuit City Stores, Inc.	Reduce by \$5,116.06 for post petition taxes, \$191.41 for insurance and \$746.90 for prepetition CAM Recon in accordance with the Debtors' books and records. Prepetition CAM Recon is already covered by claim 14427.
6/29/2009	14427	Gravois Bluffs III, LLC John E Hilton Carmody MacDonald PC 120 S Central Ave Ste 1800 St Louis, MO 63105		\$1,103,298.01 (general unsecured)	Circuit City Stores, Inc.	\$1,067,284.22 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$31,938.74 for rejection damages and \$4,075.05 for damage in accordance with the Debtors' books and records.
4/30/2009	12759	Gri Egy Sparkleberry Square LLC Augustus C. Epps Jr. Esq. Christian & Barton LLP 909 E. Main St. Ste 1200 Richmond, VA 23219-3095	Gri Egy Sparkleberry Square LLC Attn: Brianna Haggard 1600 NE Miami Gardens Dr. North Miami Beach, FL 33179	\$572,222.82 (general unsecured)	Circuit City Stores, Inc.	Unliquidated, but not less than \$572,222.82 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$1,290.92 for attorneys fees in accordance with the Debtors' books and records.
6/29/2009	14477	Jefferson Mall Company II LLC c/o Scott M. Shaw Esq. Husch Blackwell Sanders LLP 2030 Hamilton Pl. Blvd. Ste. 150 Chattanooga, TN 37421		\$247,750.39 (\$230,911.35 is general unsecured and \$16,839.04 is administrative)	Circuit City Stores, Inc.	\$229,649.41 (\$224,945.92 is general unsecured and \$4,703.49 is administrative)	Circuit City Stores, Inc.	Reduce by \$11,147.64 for November stub rent, \$5,965.43 for other prepetition taxes and \$987.91 for other post petition taxes in accordance with the Debtors' books and records.
3/27/2009	11940	Kimco North Rivers 692 Inc Attn Neil E Herman Esq c o Morgan Lewis & Bockius LLP 101 Park Ave NY, NY 10178		\$30,522.79 (administrative)	Circuit City Stores, Inc.	\$5,200.92 (administrative)	Circuit City Stores, Inc.	Reduce by \$21,565.95 for November stub rent and \$3,755.92 for post petition taxes in accordance with the Debtors' books and records.

In re Circuit City Stores, Inc, et al
Case No. 08-35653 (KRH)

Exhibit C

REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS

BOOKS AND RECORDS CLAIMS TO BE REDUCED						MODIFIED CLAIMS		
Date Filed	Claim Number	Name & Address	Additional Notice Address	Claim Amount	Debtor	Proposed Modified Claim	Debtor	Comments
3/27/2009	11923	Kimco North Rivers 692 Inc c o Morgan Lewis & Bockius LLP 101 Park Ave NY, NY 10178		\$742,428.94 (general unsecured)	Circuit City Stores, Inc.	\$677,333.82 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$65,095.12 for rejection damages in accordance with the Debtors' books and records.
4/30/2009	12812	Liquidity Solutions Inc. (Transferee) One University Plz Ste 312 Hackensack, NJ 07601	Shelbyville Road Plaza LLC Attn Tommy Edwards Hagan Properties Inc 12949 Shelbyville Rd Ste 100 Louisville, KY 40243	\$803,620.76 (\$746,623.84 is general unsecured and was transferred by Shelbyville Road Plaza LLC to Liquidity Solutions, Inc. and \$56,996.92 is administrative and was retained by Shelbyville Road Plaza LLC)	Circuit City Stores, Inc.	\$742,026.84 (general unsecured) \$0 (administrative)	Circuit City Stores, Inc.	Reduce by \$40,091.27 for November stub rent, \$7,164.46 for attorney fees and \$9,740.49 for post petition taxes in accordance with the Debtors' books and records. In addition, the landlord owes the Debtors \$4,597 for CAM Recon pursuant to the Debtors' books and records.
4/30/2009	12761	Parker Central Plaza Ltd. c/o Lynnette R. Warman Hunton & Williams LLP 1445 Ross Ave. Ste. 3700 Dallas, Tx 75202	Parker Central Plaza Ltd. 2001 Preston Rd. Plano, Tx 75093	\$1,111,951.72 (general unsecured)	Circuit City Stores, Inc.	\$927,076.79 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$71,333.94 for rejection damages and \$113,540.99 for other prepetition taxes in accordance with the Debtors' books and records. Other prepetition taxes are already covered by claim 14389.
6/30/2009	14389	Parker Central Plaza Ltd. Henry Toby P. Long III & Thomas N. Jamerson Hunton & Williams LLP Riverfront Plz E. Tower 951 E. Byrd St. Richmond, VA 23219-4074	Parker Central Plaza Ltd. Hunton & Williams LLP Lynnette R. Warman & Cameron W. Kinvig 1445 Ross Ave. Ste. 3700 Dallas, TX 75202	\$137,435.40 (administrative)	Circuit City Stores, Inc.	\$110,920.92 (\$92,788.97 is unsecured and \$18,131.95 is administrative)	Circuit City Stores, Inc.	Reduce by \$13,634.49 for other prepetition taxes and \$12,879.99 for other post petition taxes in accordance with the Debtors' books and records.

In re Circuit City Stores, Inc, et al
Case No. 08-35653 (KRH)

Exhibit C

REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS

BOOKS AND RECORDS CLAIMS TO BE REDUCED						MODIFIED CLAIMS		
Date Filed	Claim Number	Name & Address	Additional Notice Address	Claim Amount	Debtor	Proposed Modified Claim	Debtor	Comments
4/29/2009	12593	RLV Village Plaza, LP David M. Blau, Esq. Kupelian, Ormond & Magy, P.C. 25800 Northwestern Highway, Suite 950 Southfield, MI 48075		\$415,631.97 (general unsecured)	Circuit City Stores, Inc.	\$393,251.79 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$22,380.18 for prepetition rent in accordance with the Debtors' books and records.
6/26/2009	13673	Saul Holdings Limited Partnership Matthew M. Moore & Stephen A Metz Esq Shulman Rogers Gandal Pordy & Ecker PA 11921 Rockville Pike 3rd Fl Rockville , MD 20852		\$20,171.54 (administrative)	Circuit City Stores, Inc.	\$16,407.60 (administrative)	Circuit City Stores, Inc.	Reduce by \$3,763.91 for other administrative rent in accordance with Debtors' books & records
4/13/2009	12223	Saul Holdings Limited Partnership Stephen A Metz Esq Shulman Rogers Gandal Pordy & Ecker PA 11921 Rockville Pike 3rd Fl Rockville , MD 20852	Saul Holdings Limited Partnership Karen Halloran Collections Manager Assistant VP Successor to BF Saul Real Estate Investment Trust 7501 Wisconsin Ave Ste 1500 Bethesda, MD 20814	\$310,983.29 (general unsecured)	Circuit City Stores, Inc.	\$291,779.81 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$10,357.19 for prepetition rent and \$8,846.29 for rejection damages in accordance with the Debtors' books and records.
4/28/2009	12397	THF Chesterfield Two Development LLC THF Clarksburg Development One LLC THF Harrisonburg Crossing LLC THF ONC Development LLC Stephan W. Milo Wharton Aldhizer and Weaver PLC 125 S. Augusta St. Ste. 2000 Staunton, VA 24401		\$1,209,063.89 (general unsecured)	Circuit City Stores, Inc.	\$1,047,529.47 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$161,534.42 for rejection damages in accordance with the Debtors' books and records.

In re Circuit City Stores, Inc, et al
Case No. 08-35653 (KRH)

Exhibit C

REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS

BOOKS AND RECORDS CLAIMS TO BE REDUCED						MODIFIED CLAIMS		
Date Filed	Claim Number	Name & Address	Additional Notice Address	Claim Amount	Debtor	Proposed Modified Claim	Debtor	Comments
1/30/2009	9643	Tutwiler Properties Ltd c o Heather A Lee Burr & Forman LLP 420 N 20th St Ste 3400 Birmingham , AL 35203		\$617,811.66 (general unsecured)	Circuit City Stores, Inc.	\$596,820.21 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$14,583.33 for prepetition rent and \$6,408.12 for prepetition taxes in accordance with the Debtors' books and records.
1/19/2010	14797	U.S. Bank National Association, as purchaser of assets of Park National Bank c/o Woods Rogers PLC, Attn: Richard C. Maxwell 10 S. Jefferson Street Suite 1400 Roanoke, VA 24011		\$341,119.66 (general unsecured)	Circuit City Stores, Inc.	\$313,400.93 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$27,718.73 for overpayment of postpetition taxes in accordance with Debtors' books and records.
1/30/2009	8720	US 41 & I 285 Company Attn Neil E Herman Esq c o Morgan Lewis & Bockius LLP 101 Park Ave New York, NY 10178		\$1,216,831.26 (general unsecured)	Circuit City Stores, Inc.	\$1,193,652.82 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$23,108.33 for prepetition rent and \$70.11 for water/sewer in accordance with the Debtors' books and records.
3/30/2009	11963	Valley View S. C. LLC Attn: Neil E. Herman c/o Morgan Lewis & Bockius LLP 101 Park Ave. New York, NY 10178		\$1,088,915.28 (general unsecured)	Circuit City Stores, Inc.	\$1,007,015.51 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$49.83 for prepetition rent and, \$81,849.94 for rejection damages in accordance with the Debtors' books and records.
3/30/2009	12003	Valley View SC LLC Attn Neil E Herman c o Morgan Lewis & Bockius LLP 101 Park Ave New York , NY 10178		\$37,714.71 (administrative)	Circuit City Stores, Inc.	\$8,282.96 (administrative)	Circuit City Stores, Inc.	Reduce by \$29,431.75 for November stub rent in accordance with the Debtors' books and records.
4/30/2009	12741	Weingarten Nostat Inc. Attn: Jenny J. Hyun Esq. c/o Weingarten Realty Investors Houston, TX 77008 2600 Citadel Plz Dr. Ste. 125		\$1,105,995.63 (general unsecured)	Circuit City Stores, Inc.	\$1,019,027.01 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$15,057.91 for prepetition rent, \$70,970.97 for rejection damages and \$939.74 for damages in accordance with the Debtors' books and records.

In re Circuit City Stores, Inc, et al
Case No. 08-35653 (KRH)

Exhibit C

REDUCTION OF CERTAIN PARTIALLY INVALID CLAIMS

BOOKS AND RECORDS CLAIMS TO BE REDUCED						MODIFIED CLAIMS		
Date Filed	Claim Number	Name & Address	Additional Notice Address	Claim Amount	Debtor	Proposed Modified Claim	Debtor	Comments
6/29/2009	13984	Weingarten Nostat Inc. Attn: Lisa L. Seabron c/o Weingarten Realty Investors 2600 Citadel Plz Dr. Ste. 125 Houston, TX 77008		\$65,424.88 (administrative)	Circuit City Stores, Inc.	\$22,286.08 (administrative)	Circuit City Stores, Inc.	Reduce by \$40,639.62 for November stub rent, \$1,156.55 for other admin. rent, \$145.79 for postpetition taxes and \$1,196.84 for other postpetition expenses in accordance with the Debtors' books and records.
1/30/2009	9718	WRI Camp Creek Marketplace II LLC Attn: Jenny J. Hyun Esq. c/o Weingarten Realty Investors 2600 Citadel Plaza Dr. Ste. 125 Houston, TX 77008		\$1,351,782.77 (general unsecured)	Circuit City Stores, Inc.	\$1,278,079.70 (general unsecured)	Circuit City Stores, Inc.	Reduce by \$59,948.07 for rejection damages, \$13,500 for other damages and \$255 for water in accordance with the Debtors' books and records.

In re Circuit City Stores, Inc, et al
Case No. 08-35653 (KRH)

Exhibit D

MISCLASSIFIED CLAIMS

CLAIMS TO BE RECLASSIFIED						RECLASSIFIED CLAIMS		
Date Filed	Claim Number	Name & Address	Additional Notice Address	Claim Amount and Classification	Debtor	Proposed Reclassified Face Claim Amount and Classification	Debtor	Comments
6/30/2009	14389	Parker Central Plaza Ltd. Henry Toby P. Long III & Thomas N. Jamerson Hunton & Williams LLP Riverfront Plz E. Tower 951 E. Byrd St. Richmond, VA 23219-4074	Hunton & Williams LLP Lynnette R. Warman & Cameron W. Kinvig 1445 Ross Ave. Ste. 3700 Dallas, TX 75202	\$137,435.40 (administrative)	Circuit City Stores, Inc.	\$18,131.95 (administrative) \$119,303.45 (general unsecured)	Circuit City Stores	The category of other prepetition taxes is being reclassified from administrative to general unsecured.

In re Circuit City Stores, Inc, et al

Case No. 08-35653 (KRH)

Exhibit E

INVALID CLAIMS TO BE EXPUNGED

BOOKS AND RECORDS CLAIMS TO BE EXPUNGED						
Date Filed	Claim Number	Name & Address	Additional Notice Address	Claim Amount	Debtor	Comments
12/19/2008	13098	Acadia Realty Limited Partnership & Brighton Commercial LLC & Catellus Operating Limited Partnership & Cedar Development Ltd. Attn: Jennifer M. McLemore & Augustus C Epps Jr. & Michael D. Mueller Esq. & Noelle M. James Esq. c/o Christian & Barton 909 E. Main Ste. 1200 Richmond, VA 23219		Unliquidated (administrative)	Circuit City Stores, Inc.	Debtors' books and records do not support.
6/30/2009	14363	Capmark Finance Inc Keith M Aurzada & John C Leininger Bryan Cave LLP 2200 Ross Ave Ste 3300		\$1,120,367.89 (administrative)	Circuit City Stores, Inc.	Claim 14363 was not filed by the landlord. Debtor is addressing claim 14346 with the landlord.

In re Circuit City Stores, Inc, et al

Case No. 08-35653 (KRH)

Exhibit E

INVALID CLAIMS TO BE EXPUNGED

BOOKS AND RECORDS CLAIMS TO BE EXPUNGED						
Date Filed	Claim Number	Name & Address	Additional Notice Address	Claim Amount	Debtor	Comments
6/30/2009	14137	Carolina Pavilion Company c o Amy Pritchard Williams Esq K&L Gates LLP 214 N Tryon St Hearst Tower 47th Fl Charlotte, NC 28202		\$48,419.28 (administrative)	Circuit City Stores, Inc.	November stub rent and post petition taxes are covered by claim 12915. According to the Debtors' books and records, the amount asserted for attorney fees in this claim is not owed by the Debtors.
4/30/2009	12559	Centro Properties Group ta Memphis Commons Memphis TN c o David L Pollack Ballard Spahr Andrews & Ingersoll LLP 1735 Market St 51st Fl Philadelphia, PA 19103		\$54,497.84 (administrative)	Circuit City Stores, Inc.	According to the Debtors' books and records, the claim should be disallowed in its entirety because the amounts asserted in the claim are not owed.
4/30/2009	12633	Centro Properties Group ta Pensacola Square Pensacola FL c/o David L. Pollack Ballard Spahr Andrews & Ingersoll LLP 1735 Market St. 51st Fl. Philadelphia, PA 19103		\$16,996.43 (administrative)	Circuit City Stores, Inc.	Debtor has no record of amounts due to this claimant.

In re Circuit City Stores, Inc, et al

Case No. 08-35653 (KRH)

Exhibit E

INVALID CLAIMS TO BE EXPUNGED

BOOKS AND RECORDS CLAIMS TO BE EXPUNGED						
Date Filed	Claim Number	Name & Address	Additional Notice Address	Claim Amount	Debtor	Comments
4/30/2009	12647	Drexel Delaware Trust c/o Midland Loan Services Inc a Delaware Corporation c/o Katharine Battaia Thompson and Knight LLP 1722 Routh St Ste 1500 Dallas, TX 75201	Midland Loan Services Inc c/o JP Morgan Chase Lockbox 974754 PNC Bank Lockbox 14800 Frye Rd TX1 0006 Fort Worth, TX 76155	Unliquidated (general unsecured)	Circuit City Stores, Inc.	Debtor has no record of amounts due to this claimant.
6/30/2009	14347	Drexel Delaware Trust c/o Midland Loan Services Inc., a Delaware corporation c/o Katharine Battaia Thompson and Knight LLP 1722 Routh St. Ste 1500 Dallas, Tx 75201	Midland Loan Services Inc. c/o JP Morgan Chase Lockbox 974754 PNC Bank Lockbox 14800 Frye Rd. TX1 0006 Fort Worth, CTX 76155	\$63,537.81 (administrative)	Circuit City Stores, Inc.	Debtor has no record of amounts due to this claimant.
6/30/2009	14062	GRI EQY Sparkleberry Square LLC Arthur L. Gallagher Vice President 1600 NE Miami Gardens Dr. North Miami Beach, FL 33179		\$34,809.82 (administrative)	Circuit City Stores, Inc.	November stub rent. Debtors' books and records do not support.

In re Circuit City Stores, Inc, et al

Case No. 08-35653 (KRH)

Exhibit E

INVALID CLAIMS TO BE EXPUNGED

BOOKS AND RECORDS CLAIMS TO BE EXPUNGED						
Date Filed	Claim Number	Name & Address	Additional Notice Address	Claim Amount	Debtor	Comments
1/15/2009	13101	Hagan Properties, Inc. Eighth & Main Building 707 E. Main Street, Suite 1700 Richmond, VA 23218-1558		Unliquidated (administrative)	Circuit City Stores, Inc.	The items due the landlord are covered by Claim 12812.
4/8/2009	12258	Midland Loan Services Inc c o Katharine Battaia Thompson and Knight LLP 1722 Routh St Ste 1500 Dallas, TX 75201		\$890,379.81 (general unsecured)	Circuit City Stores, Inc.	Debtor has no record of amounts due to this claimant.
1/30/2009	8922	Wells Fargo Bank, NA, as Trustee for the Registered Holders of CD 2006-CD2 Commercial Mortgage Pass-Through Certificates as Collateral Assignee of RLV Village Plaza LP Mindy A. Mora, Esq. Bilzin, Sumberg, Baena, Price & Axelrod, LLP 200 S. Biscayne Blvd., Suite 2500 Miami, FL 33131		Unliquidated (general unsecured)	Circuit City Stores, Inc.	Claim 8922 was not filed by the landlord. Debtor is addressing claim 12593 with the landlord.

In re Circuit City Stores, Inc, et al

Case No. 08-35653 (KRH)

Exhibit E

INVALID CLAIMS TO BE EXPUNGED

BOOKS AND RECORDS CLAIMS TO BE EXPUNGED						
Date Filed	Claim Number	Name & Address	Additional Notice Address	Claim Amount	Debtor	Comments
6/29/2009	13987	WRI Camp Creek Marketplace II LLC Attn: James S. Carr & Robert L. LeHane Kelley Drye & Warren LLP 101 Park Ave. New York, NY 10178	Weingarten Realty Investors Attn: Lisa L. Seabron Legal Administrator 2600 Citadel Plz Dr. Ste. 125 Houston, TX 77008	\$12,883.11 (administrative)	Circuit City Stores, Inc.	Debtor has no record of amounts due to this claimant.

In re Circuit City Stores, Inc., et al
Case No. 08-35653 (KRH)
EXHIBIT F

LATE FILED CLAIMS TO BE EXPUNGED

LATE FILED CLAIMS					
Date Filed	Claim Number	Name & Address	Additional Notice Address	Claim Amount	Debtor
2/2/2009	10534	Buckhead Triangle LP c o Liquidity Solutions Inc One University Plz Ste 312 Hackensack, NJ 07601	Buckhead Triangle LP c o Liquidity Solutions Inc One University Plz Ste 312 Hackensack, NJ 07601	\$653,194.62 (general unsecured)	Circuit City Stores, Inc.
7/1/2009	14418	GEPMC 2005-C2 CC Parent, LLC (Transferee) c/o Mindy A. Mora, Esq. Bilzin Sumberg Baena Price & Axelrod LLP 200 South Biscayne Blvd., Suite 2500 Miami, FL 33131	OLP CCFerguson LLC (Transferor) c/o Michelle McMahon, Esq. 1290 Avenue of the Americas New York, NY 10104	\$7,477.10 (administrative)	Circuit City Stores, Inc.
7/1/2009	14420	GEPMC 2005 C2 South Lindbergh LLC (Transferee) c/o Mindy A. Mora, Esq. Bilzin Sumberg Baena Price & Axelrod LLP 200 S. Biscayne Blvd. Ste 2500 Miami, FL 33131	OLP CCST Louis LLC (Transferor) c/o Michelle McMahon, Esq. 1290 Avenue of the Americas New York, NY 10104	\$22,277.64 (administrative)	Circuit City Stores, Inc.

In re Circuit City Stores, Inc., et al.

Case No. 08-35653 (KRH)

EXHIBIT G

AMENDED CLAIMS TO BE EXPUNGED

CLAIMS TO BE EXPUNGED						SURVIVING CLAIM		
Date Filed	Claim Number	Name & Address	Additional Notice Address	Claim Amount	Debtor	Surviving Claim Numbers	Debtor	Face Amounts of Surviving Claim
1/30/2009	9037	Circuit Investors #2 Ltd. A Texas Partnership c/o Niclas A. Ferland, Esq. LeClairRyan, A Professional Corporation 555 Long Wharf Drive, 8th Floor New Haven, CT 06511		\$386,652.66 (general unsecured)	Circuit City Stores, Inc.	11749	Circuit City Stores, Inc.	Unliquidated (general unsecured)
6/26/2009	13633	Gravois Bluffs III LLC John E Hilton Carmody MacDonald PC 120 S Central Ste 1800 Clayton, MO 63105	G J Grewe Inc 9109 Watson Rd Ste 400 St Louis, MO 63126	\$73,908.76 (general unsecured)	Circuit City Stores, Inc.	14427	Circuit City Stores, Inc.	\$1,103,298.01 (general unsecured)
3/5/2009	11749	Park National Bank c/o Woods Rogers PLC, Attn: Richard C. Maxwell 10 S. Jefferson Street, Suite 1400 Roanoke, VA 24011		Unliquidated (general unsecured)	Circuit City Stores, Inc.	14797	Circuit City Stores, Inc.	\$341,119.66 (general unsecured)
1/28/2009	7166	Thirty & 141 LP John E. Hilton 120 S. Central Ave. Ste. 1800 St. Louis, MO 63105	Thirty & 141 LP GJ Grewe Inc. 9109 Watson Rd. Ste. 400 St. Louis, MO 63126	\$69,398.64 (general unsecured)	Circuit City Stores, Inc.	13633	Circuit City Stores, Inc.	\$73,908.76 (general unsecured)